

GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102
(973) 596-4500
Attorneys for Plaintiffs

**FINNEGAN, HENDERSON,
FARABOW, GARRETT & DUNNER, LLP**
901 New York Avenue, NW
Washington, DC 20001
(202) 408-4000
*Attorneys for Plaintiffs Valeant
Pharmaceuticals International, Inc.,
Salix Pharmaceuticals, Inc., and
Progenics Pharmaceuticals, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; SALIX
PHARMACEUTICALS, INC.; PROGENICS
PHARMACEUTICALS, INC.; and
WYETH LLC, formerly known as WYETH,

Plaintiffs,

v.

MYLAN PHARMACEUTICALS, INC.;
MYLAN LABORATORIES LTD.;
MYLAN INC.; and ACTAVIS LLC,

Defendants.

Civil Action No. 15-8180 (SRC) (CLW)
(consolidated)

Document Electronically Filed

**NOTICE OF MOTION TO
DISQUALIFY KATTEN MUCHIN
ROSENMAN LLP**

TO: COUNSEL OF RECORD

PLEASE TAKE NOTICE that on June 18, 2018, or on a date to be set by the Court, Plaintiffs Valeant Pharmaceuticals International, Inc. and Salix Pharmaceuticals, Inc. (collectively, "Plaintiffs"), by and through their undersigned counsel, shall move before the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building &

U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for entry of an Order granting Plaintiffs' Motion to Disqualify Katten Muchin Rosenman LLP from representing Defendants Mylan Pharmaceuticals, Inc., Mylan Laboratories Ltd., and Mylan Inc.

PLEASE TAKE FURTHER NOTICE that, in support of their Motion, Plaintiffs shall rely on the accompanying Brief, Declaration of Bryan C. Diner and the Exhibits annexed thereto, Declaration of Holly Smith, and Declaration of John F. LaFave, as well as all other papers and pleadings on file in this matter.

PLEASE TAKE FURTHER NOTICE that oral argument is requested for this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Certification attesting to the date and manner of service of these moving papers is also submitted herewith.

Dated: May 25, 2018
Newark, New Jersey

Respectfully submitted,

s/ William P. Deni, Jr.

William P. Deni, Jr.
Charles H. Chevalier
J. Brugh Lower
Cymetra M. Williams
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102
Tel: (973) 596-4500
Fax: (973) 596-0545
wdeni@gibbonslaw.com
cchevalier@gibbonslaw.com
jlower@gibbonslaw.com
cwilliams@gibbonslaw.com

Attorneys for Plaintiffs

Bryan C. Diner
Justin J. Hasford (*pro hac vice*)
Megan Leinen Johns (*pro hac vice*)
Kristi L. McIntyre (*pro hac vice*)
**FINNEGAN, HENDERSON,
FARABOW, GARRETT & DUNNER, LLP**
901 New York Avenue, NW
Washington, DC 20001-4413
(202) 408-4000

Jessica M. Lebeis (*pro hac vice*)
**FINNEGAN, HENDERSON,
FARABOW, GARRETT & DUNNER, LLP**
271 17th Street, NW
Suite 1400
Atlanta, GA 30363-6209
(404) 653-6400

Attorneys for Plaintiffs
Valeant Pharmaceuticals International, Inc.,
Salix Pharmaceuticals, Inc., and
Progenics Pharmaceuticals, Inc.